

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES
CORPORATION,

Plaintiff,

v.

ZYNGA INC.,

Defendant.

Case No. 22-cv-590-GBW

STIPULATION AND [PROPOSED] ORDER TO STAY

WHEREAS, the parties have continued to work towards a resolution of this case; and

WHEREAS, the parties have reached an agreement in principle to resolve their dispute and jointly request that the Court stay all deadlines in this case, so they can focus their efforts on finalizing the resolution;

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that all deadlines in this case are stayed. If the parties have not filed a stipulation of dismissal by December 30, 2024, they shall submit a joint status report to the Court.

POTTER ANDERSON & CORROON LLP

FARNAN LLP

By: /s/ David E. Moore

By: /s/ Brian E. Farnan

David E. Moore (#3983)
Bindu A. Palapura (#5370)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com

Brian E. Farnan (#4089)
Michael J. Farnan (#5165)
919 North Market Street, 12th Floor
Wilmington, DE 19801
Tel: (302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

*Attorneys for Plaintiff International Business
Machines Corporation*

Attorneys for Defendant Zynga Inc.

Dated: December 13, 2024

SO ORDERED this ____ day of _____, 2024.

United States District Judge